

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

TP GROUP-CI, INC. )  
Plaintiff, )  
                    )  
                    ) Case No. \_\_\_\_\_  
v.                 )  
                    )  
IVAN VETECNIK, )  
Defendant.       )

**PLAINTIFF'S MOTION FOR EXPEDITED DISCOVERY**

Please take notice that, pursuant to Federal Rule of Civil Procedure 26(d)(1), Plaintiff TP Group-CI, Inc., by and through its attorneys, respectfully moves for the entry on an Order, attached hereto as Exhibit A, granting it leave to serve limited, expedited party discovery prior to a Rule 26(f) conference. Plaintiff's proposed Requests for the Production of Documents, to be answered within fourteen (14) days, are attached hereto as Exhibit B. This expedited discovery will be part of the expedited schedule as proposed in Plaintiff's Motion for Preliminary Injunction. In support of its Motion, Plaintiff files the accompanying Memorandum of Law.

Dated: July 22, 2016

/s/ Jody C. Barillare  
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Jody C. Barillare (#5107)  
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